

## **REMARKS**

### **Pending Claims**

Claims 1-2 have been amended. Claims 3-6 have been canceled without prejudice or disclaimer. New claims 7-11 have been added. Accordingly, claims 1-2 and 7-11 are pending in this application. A Request for Continued Examination and the required fee accompany this paper.

### **35 U.S.C. §112**

Claim 2 stands rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In particular, "said two output values" in line 18 of claim 2 lacked antecedent basis. In response, Applicants have amended this portion of the claim. Applicants respectfully request reconsideration and withdrawal of the rejection in light of this amendment.

### **35 U.S.C. §102**

Claims 1 and 2 stand rejected under 35 U.S.C. §102(e) as being anticipated by Tanaka et al., U.S. Patent No. 6,820,168 (hereafter "Tanaka"). Applicants respectfully traverse the rejections, and request reconsideration and withdrawal of the rejections for the following reasons.

As amended, claim 1 includes that a program identifier set in advance in said program and a separate original request address issued by said program are applied to a first function as two input values that are used to generate *one value used as a new request address of the IO request*, which is *different from said original request address* and which is *created by said program*.

Tanaka, on the other hand, does not create a new request address for the IO request. Instead, in the SCSI example, Tanaka adds an LPAR ID to a separate designated area 380 in a payload of a data frame 300 following a logical block address entry area 375 and a logical volume number area 370 of the data frame payload (see, e.g., FIG. 3). Thus, Applicants respectfully submit that Tanaka does not create one value used as a new request address of the IO request, as required by Applicants' claim 1.

Additionally, the Office Action equates Tanaka's logical block address to Applicants' original request address (e.g., Office Action at page 2, lines 10-14). If this is the case, Tanaka's logical block address remains unchanged since the LPAR ID is added to a separate area 380 of the data frame payload. Thus the LPAR ID does not form any part of the logical block address and does not make up a new request address, different from the original request address, as recited in Applicants' claim 1. In other words, since Tanaka merely adds the LPAR ID to a separate area of the data frame, Tanaka does not use a program identifier and the original request address to generate a new request address, as also required by Applicants' claim 1.

To the contrary, the logical block address of Tanaka remains unchanged following the addition of the LPAR ID to the data frame.

What is more, under Applicants' invention, the new request address is created by the same program issuing the request. Namely, the program itself is able to apply the first function to the program identifier and original request address to create the new request address. In the examples set forth in Tanaka, on the other hand, the hypervisor instructs the device drivers to add the LPAR IDs to the payload of the data frame (see, e.g., col. 7, lines 40-64). Thus, Applicants respectfully submit that Tanaka also fails to teach or suggest that the new request address is created by the program, as recited in Applicants' amended claim 1.

Furthermore, Applicants' amended claim 1 now includes that *the new request address is a same size as said separate original request address*. This limitation finds support at page 8, lines 16-25. In particular, the program identifier may be combined with the original request address by placing the identifier in unused higher order bit areas of the original request address. Thus, the new request address remains the same size as the original request address. In Tanaka, on the other hand, there is no generation of a new request address from a program identifier and an original request address. Instead, the LPAR ID is added to the payload of a data frame in a designated area. However, if the appending of the LPAR ID to the logical block address creates a new request address (as asserted in the Office Action), then Applicants respectfully submit that this still does not meet Applicants' limitation that

the new request address is a same size as the original request address since Tanaka's LPAR ID is added to the payload following the logical block address.

Finally, Applicants respectfully disagree that Tanaka teaches that said IO request is issued by using said new request address, as also recited in Applicants' claim 1. As discussed above, since Tanaka does not teach generating a new request address, Tanaka does not teach issuing an IO request using a new request address. Instead, in Tanaka, the logical block address remains the same before and after the LPAR ID is added to the data frame.

For the foregoing reasons, Applicants respectfully submit that claim 1 is allowable over Tanaka and the other art of record, whether taken singly, or in combination. New independent claim 7 contains limitations similar to those discussed above with respect to claim 1, and is allowable under the same rationale.

Amended independent claim 2 also includes limitations similar to those discussed above, and is allowable for the same reasons set forth above with respect to claim 1. Further, claim 2 includes that said table is searched for said at least one *network address associated with said generated program identifier* and said at least one logical volume indicated by said generated original request address, and a *communication with said storage apparatus is carried out by using said at least one network address as an address of a transmission originator* in order to issue an IO command to said original request address. As discussed, for example, at page 13, lines 13-16, and page 14, lines 18-24, a network address associated with the

program identifier is used as the address of the transmission originator, for instance, in place of the usual network address of the computer sending the IO request.

Applicants respectfully note that Tanaka does not teach or suggest this. The Office Action asserts that this is taught at column 11, lines 5-10 of Tanaka. However, Applicants respectfully submit that this portion of Tanaka is referring to processing taking place on the disk apparatus following receipt of a data frame, and this portion of Tanaka provides no discussion regarding sending an IO request, or using a network address associated with said generated program identifier as an address of a transmission originator in order to issue an IO command, as recited in Applicants' claim 2. Accordingly, independent claim 2 is also allowable over Tanaka and the other art of record on this point. New dependent claim 8 is directed to similar subject matter, and is allowable for the same reasons.

New dependent claims 9 and 10 are directed to the subject matter of canceled claims 3 and 4, respectively. These claims are patentable over Tanaka for the same reasons as claims 2 and 8 discussed above. New dependent claim 11 further clarifies how the new request address is generated. As discussed above, this claim finds support, e.g., at page 8, lines 16-25, and is allowable for the reasons discussed above with respect to the pertinent portion of claims 1 and 7.

**Request for Interview**

Applicants' undersigned representative will contact the Examiner to schedule an in-person interview prior to issuance of the next Office Action to attempt to advance prosecution of this application in a more expeditious manner.

**Conclusion**

In view of the foregoing, Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Colin D. Barnitz', with a stylized, sweeping flourish at the end.

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